STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

APPLICATION OF MEWBOURNE OIL COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 20506

MAGNUM HUNTER PRODUCTION, INC.'S PRE-HEARING STATEMENT

Magnum Hunter Production, Inc. submits this Pre-Hearing Statement for the abovereferenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u> <u>ATTORNEY</u>

Mewbourne Oil Company Gary W. Larson
Dana S. Hardy

HINKLE SHANOR LLP

P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Fax: (505) 982-8623

glarson@hinklelawfirm.com dhardy@hinklelawfinn.com

<u>OPPOSING</u> <u>ATTORNEY</u>

Magnum Hunter Production, Inc. Earl E. DeBrine, Jr.

Lance D. Hough

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

P. O. Box 2168

Albuquerque, New Mexico 87103-2168

Phone: (505) 848-1800 Fax: (505) 848-1891 edebrine@modrall.com ldh@modrall.com

STATEMENT OF CASE

Mewbourne Oil Company seeks an order for the pooling of all uncommitted mineral interests in the Wolfcamp formation in a 640-acre standard horizontal spacing unit comprised of the S/2 of Section 17 and the S/2 of Section 18, Township 22 South, Range 27 East, N.M.P.M., Eddy County, New Mexico for its proposed **Heavyweights 17/18 WOPM Fee #1H** well.

Magnum Hunter opposes Melbourne's application because if granted it will result in waste and impair Magnum Hunter's correlative rights.

PROPOSED EVIDENCE

MAGNUM HUNTER:

WITNESS	ESTIMATED TIME	EXHIBITS
Caitlin Pierce – Landman	Approx. 20	Approx. 5
Geologist (TBD)	Approx. 6	Approx 30

PROCEDURAL ISSUES

Magnum Hunter requests that this Case be continued to a future hearing Examiner docket schedule to allow time for the parties to negotiate and for Magnum Hunter to prepare for the hearing.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

Earl E. DeBrine, Jr.

Lance D. Hough

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800 edebrine@modrall.com

ldh@modrall.com

Attorneys for Magnum Hunter Production, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on June 6, 2019:

Gary W. Larson
Dana S. Hardy
HINKLE SHANOR LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
Telephone: (505) 982-4554
glarson@hinklelawfirm.com
dhardy@hinklelawfinn.com

MODRALL, SPERLING, ROEHL, HARRIS

& SISK, P.A.

By: ____**<**

Lance D. Hough

W3440951.DOCX